

August 15, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Grain Millers supports the list as published, and would like to especially support the continued allowance of the following substance:

**Name of Substance: Carbon Dioxide**

**Location on National List: 205.605 (b)**

**Reason(s) for Continued Allowance:**

**We believe that Carbon Dioxide should continue to be on the National List of Allowed Substances. Carbon dioxide is used as an environmentally friendly, non-toxic solvent in the supercritical extraction of oil from oilseeds such as soybeans. Currently there are no other organic solvents that can be used for this process. Use of Carbon Dioxide as a solvent allows the meal product that is produced to have significantly lower fat content than standard cold press methods. This lower fat level in the meal is necessary to allow for the further manufacturing of soy isolates and soy flour concentrates that are used as ingredients in numerous products.. Carbon Dioxide is also used in the carbonation of beverages where it performs a critical function.**

Sincerely,

Roger Mortenson  
Vice President  
Grain Millers Specialty Products